NORLITE CORPORATION

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October 10, 2012

Karen M. Gaidasz, CPESC
Environmental Analyst
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 09/17/12- 10/08/12
Kiln 2: 09/17/12- 10/08/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 09/17/12 thru 10/08/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. The majority of the cutoffs were found to be caused by controlling LGF Flow with valves and having high LGF Line pressure. The high LGF line pressure made finite control with the valve very difficult. Most of the cutoffs were results of a pressure pulse in the kiln system which was a result of a sudden LGF fuel surge caused by minute valve changes. A second cause for some of the cutoffs was power outages for Kiln 2 which reduced the capacity of the Rear Chamber draft system which affected Kiln 1's Rear System.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.
Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments
ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments
Tita LaGrimas, Tradebe w/attachments

DCL: 2410

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
09/17/12 - 10/08/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
9/18/2012	9:45:41	9/18/2012	9:49:44	0:04:03	128	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow
9/19/2012	3:42:49	9/19/2012	3:43:42	0:00:53	129	Malfunction	Kiln 2 was Down Due to A Power Failure. The Isolation Valve on the Draft System for the Rear Chamber System Was Not Closed Which Caused An Overall Reduction In Draft Capability On the Kiln 1 System.	Back Chamber Pressure, 1 Second Delay	Opl	Closed Isolation Valve and Adjusted Fan System
9/19/2012	10:42:02	9/19/2012	10:47:31	0:05:29	130	Malfunction	Kiln 2 was Down Due to A Power Failure. The Isolation Valve on the Draft System for the Rear Chamber System Was Not Closed Which Caused An Overall Reduction In Draft Capability On the Kiln 1 System.	Back Chamber Pressure, 1 Second Delay	Opl	Closed Isolation Valve and Adjusted Fan System
9/20/2012	4:55:49	9/20/2012	4:56:33	0:00:44	131	Malfunction	Kiln Operators Continued to Make Fan Adjustments to Maintain Sufficient Draft. Ultimately, the Kiln Was Shutdown on 09/25/12 for Baghouse and Scrubber Maintenance	Back Chamber Pressure, 1 Second Delay	Opl	Kiln Shutdown for Maintenance
9/20/2012	17:17:34	9/20/2012	17:19:45	0:02:11	132	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
9/22/2012	8:01:43	9/22/2012	8:07:19	0:05:36	133	Malfunction	Kiln Operators Continued to Make Fan Adjustments to Maintain Sufficient Draft. Ultimately, the Kiln Was Shutdown on 09/25/12 for Baghouse and Scrubber Maintenance	Back Chamber Pressure, 1 Second Delay	Opl	Kiln Shutdown for Maintenance
9/24/2012	12:11:57	9/24/2012	12:12:28	0:00:31	134	Malfunction	Kiln Operators Continued to Make Fan Adjustments to Maintain Sufficient Draft. Ultimately, the Kiln Was Shutdown on 09/25/12 for Baghouse and Scrubber Maintenance	Front Kiln Pressure, 1 Second Delay	Opl	Kiln Shutdown for Maintenance
9/25/2012	15:00:52	9/25/2012	15:06:39	0:05:47	135	Malfunction	Kiln Operators Continued to Make Fan Adjustments to Maintain Sufficient Draft. Ultimately, the Kiln Was Shutdown on 09/25/12 for Baghouse and Scrubber Maintenance	Back Chamber Pressure, 1 Second Delay	Opl	Kiln Shutdown for Maintenance
9/27/2012	9:07:20	9/27/2012	9:08:25	0:01:05	136	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow
10/1/2012	5:11:37	10/1/2012	5:17:18	0:05:41	137	Malfunction	Kiln 2 was Down Due to A Power Failure. The Isolation Valve on the Draft System for the Rear Chamber System Was Not Closed Which Caused An Overall Reduction In Draft Capability On the Kiln 1 System.	Back Chamber HRA	Opl	Closed Isolation Valve and Adjusted Fan System
10/1/2012	10:26:37	10/1/2012	10:58:49	0:32:12	138	Malfunction	Kiln 2 was Down Due to A Power Failure. The Isolation Valve on the Draft System for the Rear Chamber System Was Not Closed Which Caused An Overall Reduction In Draft Capability On the Kiln 1 System.	Back Chamber HRA	Opl	Closed Isolation Valve and Adjusted Fan System

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
09/17/12 - 10/08/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
10/1/2012	21:19:00	10/1/2012	21:35:21	0:16:21	139	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
10/4/2012	10:07:00	10/4/2012	10:07:50	0:00:50	140	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/7/2012	2:04:43	10/7/2012	2:05:20	0:00:37	141	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
10/7/2012	5:21:18	10/7/2012	5:23:02	0:01:44	142	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
10/7/2012	7:03:14	10/7/2012	7:09:35	0:06:21	143	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
10/7/2012	7:35:49	10/7/2012	7:42:27	0:06:38	144	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
09/17/12 - 10/08/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
9/20/2012	22:47:25	9/20/2012	22:48:26	0:01:01	330	Malfunction	After A Tank Switch The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/20/2012	23:49:33	9/20/2012	23:50:16	0:00:43	331	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/23/2012	15:23:16	9/23/2012	15:25:16	0:02:00	332	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
9/27/2012	4:53:21	9/27/2012	4:53:51	0:00:30	333	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/28/2012	3:47:54	9/28/2012	3:48:19	0:00:25	334	Malfunction	After A Tank Switch The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/28/2012	9:12:37	9/28/2012	9:12:56	0:00:19	335	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/28/2012	20:13:19	9/28/2012	20:14:26	0:01:07	336	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
10/3/2012	8:31:19	10/3/2012	8:31:49	0:00:30	337	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow

10/5/2012	0:53:11	10/5/2012	0:53:40	0:00:29	338	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow